

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of: )  
CONCILIO ET AL. )  
Serial No. 10/725,193 ) Examiner: F. Almatrahi  
Filing Date: December 1, 2003 ) Art Unit: 3627  
For: METHOD FOR THE DECOMPOSITION )  
IN MODULES OF SMART-CARD )  
EVENT-DRIVEN APPLICATIONS )  
)

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

MS AF  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

Responsive to the final Office Action of September 9, 2008, and in connection with the Notice of Appeal filed concurrently herewith, please consider the remarks set out below.

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**REMARKS**

Based upon the arguments presented below, Applicant respectfully requests the Pre-Appeal Conference Panel to reconsider and withdraw the Examiner's rejections of the claims.

**I. The Claimed Invention**

Independent Claim 16 recites a method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed or separated into a central module and at least one complementary module. Independent method Claim 16 includes managing interaction between the modules by a framework of the smart-card. After at least beginning execution of the central module by the framework based upon an external event, a new set of internal events is generated by the framework for managing the at least one complementary module.

Independent Claim 24 is directed to a method for executing an event-driven application resident in a smart-card comprising a fundamental module, the application being separating into a central module and at least one complementary module. The method comprises managing interaction between the central module and the at least one complementary module by the fundamental module. After at least beginning execution of the central module by the fundamental module based upon an external event, an internal event is generated by the fundamental module for managing the at

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least one complementary module. Independent Claim 32 is a device counterpart to independent Claim 24.

### **II. The Claims Are Patentable**

The Examiner rejected independent Claims 16, 24, and 32 over the combination of Valencia et al. and Coutts et al. Valencia et al. discloses a system allowing paperless coupon redemption including a smart-card and a smart-card reader. The smart-card comprises a microcomputer and a memory coupled together through an address bus and a data bus. A CPU of the microcomputer is coupled to a timer through the data bus and an internal interrupt signal bus. Internal memories such as a read-only memory and a random access memory of the microcomputer are coupled through the address bus and the data bus to an interface for communication with the smart-card reader. Coutts et al. was cited as disclosing the generation of an internal event by a framework of a smart-card.

Even the selective combination of Valencia and Coutts, however, fails to disclose all the features of independent Claim 16. The Examiner cited Valencia as disclosing a method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module and at least one complementary module. Valencia makes no such disclosure. In fact, Valencia does not disclose an application resident in its smart card whatsoever. Rather, the smart card of

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Valencia is used to store individual running balances attributed to particular manufacturers or retailers who offer discount coupons (see col. 9, lines 40-53). Since Valencia fails to disclose an event-driven application resident in its smart card, it also fails to disclose that the application is decomposed into a central module and at least one complementary module. Coutts et al. fails to provide these critical deficiencies, therefore the combination of Valencia and Coutts et al. fails to disclose a method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module and at least one complementary module.

The Examiner also cited Valencia as disclosing managing interaction between the modules by a framework of the smart-card. However, as discussed above, Valencia fails to disclose any modules whatsoever. Valencia also fails to disclose a framework of the smart-card. Since Coutts et al. fails to provide these critical deficiencies, the combination of Valencia and Coutts et al. fails to disclose managing interaction between the modules by a framework of the smart-card.

Moreover, the Examiner cited Valencia as disclosing after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module. As argued above, Valencia fails to disclose the central module, the complementary module, and the framework.

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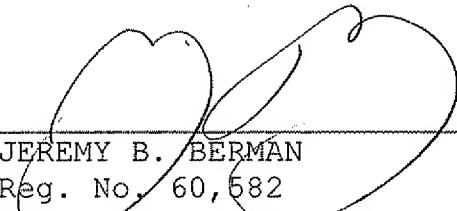
Valencia, and therefore the combination of Valencia and Coutts et al., does not and can not disclose after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module.

The Examiner stated that Valencia does not explicitly recite the event generated being an internal event and cited to Coutts to provide this critical deficiency. However, the portion of Coutts et. al. cited as disclosing the generation of an internal event by a framework of a smart-card (col. 12, lines 16-34) is actually directed to the generation of an internal event by an individual application module of an Automated Teller Machine. Furthermore, applicant submits that one of skill in the art, seeking to modify a method for executing an event-driven application resident in a smart-card, would simply not look to an application module of an Automated Teller Machine.

In conclusion, the combination of Valencia and Coutts et al. fails to disclose any of the features of independent Claim 16, which is therefore patentable. Independent Claims 24 and 32 contain similar recitations and are patentable for the same reasons. The dependent claims, which recite yet further distinguishing details, are likewise patentable and require no further discussion herein.

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Respectfully submitted,

  
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